

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>KAREN LYNN HACKNEY</b>	:	
<b>Debtor</b>	:	<b>CASE NO. 1:17-bk-03860</b>
	:	
<b>UNITED STATES OF AMERICA, acting</b>	:	
<b>through Farm Service agency,</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>KAREN LYNN HACKNEY,</b>	:	
<b>Respondent</b>	:	

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Proof of default is demanded at trial and this averment is therefore denied, pending Debtor's research of payments made.
9. Admitted.
10. This paragraph states a legal conclusion to which no response is required. To the extent an answer is required, this averment is denied.
11. Proof of default is demanded at trial and this averment is therefore denied, pending Debtor's research of payments made.

12. Proof of amount of is demanded at trial and this averment is therefore denied.
13. Denied that Movant has demonstrated cause for relief.
14. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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